

MAY 21 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

August 24, 1995

IN PART OR LATE FILED

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Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Regarding **MM Docket No. 93-48**, your Proposed Rule Making for Children's Television, you must certainly be aware that broadcasters have significantly increased children's educational and informational programming in response to the Children's Television Act.

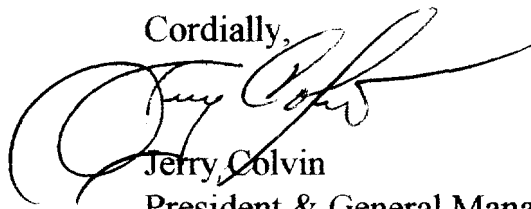
Broadcasters are responsible people that understand the need to educate our children and are striving to do just that. **We do not need quotas mandated by the FCC or Congress.**

You also know very well that children have short attention spans and it is difficult to keep their interest for an educational half hour program. Therefore, **short segment programming is vital in getting a message to them and credit should be allowed**

The only people that would benefit from quotas would be the syndicators that would have to produce so much "FCC qualified" programming that the intent and quality would be totally lost.

I URGE YOU TO KEEP THE CURRENT CHILDREN'S TELEVISION ACT, UNALTERED, IN PLACE AND NOT IMPLEMENT QUOTAS.

Cordially,



Jerry Colvin

President & General Manager

cc: Chairman Reed Hundt
Commissioners Quello, Barrett, Ness & Chong



Television Hill
Baltimore, Maryland 21211
Group W Television

Marcellus W. Alexander, Jr.
Vice President and
General Manager
(410) 578-7507

29 August 1995

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MAY 21 1995

Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

Dear Sir or Madame:

We at WJZ have become aware of the proposed rule to make "numerical quotas" as part of the Children's Television Act. As a broadcaster in Baltimore that enjoys a strong reputation in the community, I can say that our station has been active in responding to the Act. New rules are not needed. Broadcasters understand the current definition of "educational and informational children's programming." With an exception of a few stations around the nation that have paid the price for non-compliance, the spirit of Act has been followed. There is more and better television available to children on broadcast television than ever before. In addition, stations like WJZ are reaching out to the community by providing educational children's specials to school systems for their videotape libraries. These tapes will be provided FREE OF CHARGE, to all county and city school systems in our television market.

Lastly, we are also looking at short segments, such as vignettes for kids. These can run through the day and especially on weekends when kids and parents are watching. Hopefully, the Commission will see the value of such short segments as well.

In conclusion, we at WJZ feel that if all stations make a wholehearted effort to comply with the Act as a part of their everyday working mantra, the cost and effort necessary to establish and "police" numerical quotas will not be necessary, and broadcasters will be free to be creative in the way they service this very important segment of our viewing audience.

Sincerely,

Marcellus W. Alexander
Vice President & General Manager
WJZ-TV

cc: Chairman Reed Hunt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong





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August 28, 1995

415 LACKAWANNA AVENUE • SCRANTON, PENNSYLVANIA • 18503
(717) 961-2222 • FAX (717) 342-1254

Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RE: MM Docket No. 93-48

Mr Secretary:

This letter is submitted to voice my concern regarding the above-referenced Docket currently before the Commission.

Broadcasters have responded to the call to expand educational and informational programming. As our portion of the broadcast spectrum diminishes in the face of new delivery systems, we continue to provide increasing amounts of such programming. The Children's Television Act is working!

Quantification does not assure quality and airing even the most instructional and educational programming does not guarantee we will reach the target audience. Both long-form and short-form programming should be used to entertain AND instruct. Such programming exists today on our networks and at local television stations.

New rules are unnecessary. Broadcasters are acting responsibly in providing children's television. We know our obligations to our viewers and our communities.

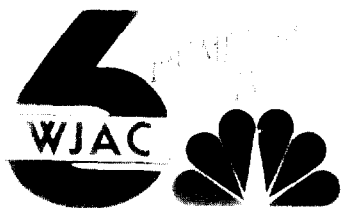
Respectfully submitted,

Harry McClintock
Harry McClintock
Operations Manager
WYOU-TV

cc: Reed Hundt, Chairman
James Quello, Commissioner
Andrew Barrett, Commissioner
Susan Ness, Commissioner
Rachelle Chong, Commissioner

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MAY 21 1995
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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August 31, 1995

Secretary
Federal Communications Committee
1919 M Street, NW
Washington, DC 20554

RE: MM Docket No. 93-48

Dear Mr. Secretary:

We would like to express our concern over the proposed rulemaking to considerably tighten the rules implementing the Children's Television Act, including possible setting numerical quotas for educational and informational children's programming.

The area of children's television is one of extreme importance and high visibility, given it's statutory basis. As broadcasters, we can expect that the FCC will go to great lengths to enforce the standards set forth in the Act. It is for this reason that WJAC and our fellow broadcasters have significantly increased children's educational and informational programming voluntarily. Therefore, rules quantifying the amount of required programming are unnecessary.

The definition of "educational and informational programming" is another area for proposed changes. However, broadcasters have a solid understanding of the expansive definition set forth in the act and follow the guidelines with the utmost integrity. In no way do broadcasters see the current definition as an open door to manipulate the purpose of the Act.

In conclusion, local broadcasters do recognize their obligation to serve their young viewers. For many years they have done so with pride and this will continue far into the future. The Act and the current FCC rule are working therefore enacting a change is simply not necessary.

Sincerely,

Vicki Turjan
Program Director

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong

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MM93-48

RECEIVED

MAY 21 1995

TO: DIRECTOR, FCC
FROM: KGAN-TV
SUBJECT: [illegible]

August 29, 1995

Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Dear Secretary,

"Quotas" for educational and informational children's programming will not promote quality programming nor will they insure viewership.

There are television stations out here in America that take their "public trust" seriously. They don't need to be coerced to do so.

In early September KGAN NewsChannel 2 will launch its sixth year of "Celebrate Education", an intense year-long programming initiative. The goal is to address important and compelling issues to elementary and high school students. We've carried this out without prodding or coercion from the federal government. We'll do other similar projects because its the right thing to do.

Quotas, frankly, will get in the way. If your agency legislates how, when, and what we can do regarding children's programming, then that's what you'll get but it will diminish the resources we can apply to homegrown initiatives.

One more thought is appropriate. Your EEOC guidelines suggest that we will be judged on conformance with your procedures in spite of the results. That's backwards, and it now seems that you plan to apply the same "backwards" thinking to children's programming. The procedures will be followed and quotas will be met, but creative and innovative homegrown initiatives will suffer.

Sincerely,

Richard Herbst
President & General Manager

cc: Michael Bock, Vice President of Television
Guy Gannett Communications

[illegible signature]

Edward Fritts, President & CEO
National Association of Broadcasters

Reed Hundt, James Quello, Andrew Barrett, Susan Ness, Rachelle Chong

KGAN-TV

600-2 Old Marion Road N.E. • P.O. Box 3131 • Cedar Rapids, Iowa 52406
319/395-9060 • Fax 319/395-0987

A Division of Guy Gannett Communications



MM 93-48

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August 29, 1995

Secretary
Federal Communications Commission
1919 M. Street, NW
Washington, D.C. 20554

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COMMUNICATIONS SECTION

Dear Secretary,

KGAN-TV has a commendable 40 year commitment to kids and kids programming. Producing local origination and buying the best in syndication, parents and kids continue to find our station to be a trusted source of information and entertainment for kids. We target and acquire those young viewers because doing the right thing is also good for our business.

We endorse and comply with the FCC's current rules on kids programming. We oppose the new rule changes up for discussion under MM Docket No. 93-48. KGAN conducts a regular review and audit to assure compliance. Each year we continue to renew and acquire additional "friendly" programs to create a safety margin for ourselves. We have been properly motivated to do all of this without numerical quotas. If you had spelled out the requirements any more specifically, you might have gotten exactly what you asked for. The Children's Television Act is working fine, please reject the rule changes under consideration.

Sincerely,

William S. Anderson
Vice President and Station Manager

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10/1/95
10/1/95

cc FCC: Reed Hundt, James Quello, Andrew Barrett, Susan Ness, Rachelle Chong,
Guy Gannett Communications: Mike Bock

KGAN-TV

600-2 Old Marion Road N.E. • P.O. Box 3131 • Cedar Rapids, Iowa 52406
319/395-9060 • Fax 319/395-0987

A Division of Guy Gannett Communications

12-12-1995 12:14 PM FILED

WSAZ
television 3

DON RAY
GENERAL MANAGER

September 1, 1995

Secretary
Federal Communications Commission
1919 M St., NW
Washington, DC 20554

THE MAY 21 1996

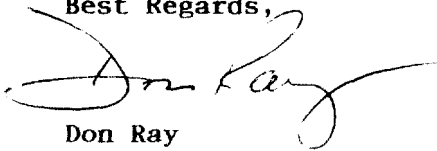
The FCC is considering new rules regarding Children's Television (MM Docket No. 93-48). New rules are not needed at this time. Current FCC rules are working and broadcasters have significantly increased children's educational and informational programming.

Rules quantifying quotas are unnecessary. We are responding to the Children's Television Act without having to meet quotas. Quantification sets a maximum as well as a minimum. This could even serve as a limit to educational programming.

Key elements in broadcasting are reach and frequency. Researchers say a good mix of reach and frequency can be effective as an education tool. Therefore, short form programming is important for kids and should be measured.

Thank you for your consideration.

Best Regards,


Don Ray
General Manager

DR:hr

cc: Reed Hundt, Chairman
James Quello, Commissioner
Andrew Barrett, Commissioner
Susan Ness, Commissioner
Rachelle Chong, Commissioner

NAB

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11-143-18

MICHAEL C. MORAN

*Vice President &
Station Manager*

August 30, 1995

William Caton
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Dear Mr. Caton:

Please accept my comments regarding modifications to the Children's Television Act. I oppose the institution of any numerical quotas for educational and informational children's programming.

Existing guidelines have encouraged an increase response toward doing a better job for children, including ours here in western Massachusetts. It's in the best interest of our younger viewers, some of whom may be future advertisers and employees, and many of whom share their parents with us now at NEWS40.

We respect not only the letter of the law; more importantly, we value the spirit of the law. I hope the Federal Communications Commission permits us to continue to embrace such a philosophy.

Sincerely,

c: Chairman Reed Hundt
Commissioner Rachelle Chong
Commissioner James Quello ✓
Commissioner Susan Ness
Commissioner Andrew Barrett